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FILED
MAR 18 2024
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

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7 UNITED STATES BANKRUPTCY COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 IN RE:	Case No.: 24-30074 DM
11	Chapter 11
12	OPPOSITION TO JOANNE ENG'S MOTION
13	TO CONVERT DEBTOR'S CHAPTER 11
14	INTO CHAPTER 7
15	Date: March 29, 2024
16	Time: 10:00 a.m.
17	Via Tele/Video Conference
18	www.canb.uscourts.gov/calendar

19 MOTION IS BASELESS

20 The instant motion by Joanne Eng (Ms. Eng) is devoid of facts to support a motion to convert.

21 Ms. Eng's contention is that she is part owner of the property known as 949-953 Lombard Street,
22 San Francisco (the "Lombard Street Property"). Ms. Eng's claim is belied by the judgment
23 entered in San Francisco Superior Court Case No. CGC 15-548357 on October 7, 2021, in which
24 it declared that LEGAL RECOVERY LLC (LR) is the owner of 100% of the economic interest
25 in LOMBARD FLATS LLC (which was the title owner of the Lombard Street Property); a
26 money judgment of \$2,453,393.60 was entered in favor of LR, and that LR may seize, execute
27 or foreclose on LOMBARD FLATS LLC's properties. Subsequently, LR obtained a Writ of
Execution and a Sheriff's Sale of the Lombard Street Property was conducted on January 30,
2024 at which LR was the purchaser. The Sheriff's Deed was recorded on Feb. 5, 2024,

1 transferring full ownership of the Lombard Street Property to LR. Therefore, Ms. Eng's claim
2 is baseless, and the instant motion should be denied.
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5 Dated: 3/8/2024
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7 UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

8 IN RE:
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LEGAL RECOVERY, LLC
Debtor

Case No.: 24-30074 DM
Chapter 11

DECLARATION OF LEEDS DISSTON IN
SUPPORT OF OPPOSITION TO JOANNE
ENG'S MOTION TO CONVERT DEBTOR'S
CHAPTER 11 INTO CHAPTER 7

Date: March 29, 2024
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I, Leeds Disston, declare:

1. I am the attorney for Legal Recovery LLC (LR).
2. On 7/8/2015, LR obtained a judgment of \$1,507,302.92 against MARTIN ENG (ENG) in San Francisco Superior Court Case No. CGC 14-542378, a charging order against ENG's membership interest in LOMBARD FLATS LLC, which was the title owner the property known as 949-953 Lombard Street, San Francisco, (the "Lombard Street Property"), and foreclosed on the charging order lien and acquired all of ENG's interest in LOMBARD FLATS LLC.
3. In San Francisco Superior Court Case No. CGC 15-548357, LR sued ENG, LOMBARD FLATS LLC, and other defendants for conspiracy on fraudulent conveyances. On October 7, 2021, the trial court issued the Statement of Decision and Judgment (the "Judgment"). The Judgment set aside various fraudulent conveyances, declared ENG the sole member and that LR is the owner of 100% of the economic interest in LOMBARD

1 FLATS LLC; entered a money judgment of \$2,453,393.60 in favor of LR, and that LR
2 may seize, execute on or foreclose on LOMBARD FLATS LLC's properties.

3 Subsequently, LR obtained a Writ of Execution and a Sheriff's Sale of the Lombard
4 Street Property was conducted on January 30, 2024 at which LR was the purchaser. The
5 Sheriff's Deed was recorded on Feb. 5, 2024, transferring full ownership of the Lombard
6 Street Property to LR.

7 I declare under penalty of perjury under the law of California that the foregoing is true and
8 correct.

9 March 8, 2024

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11 /s/ Leeds Disston 
12 Attorney for Legal Recovery LLC

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